

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re : Chapter 11
TERRAFORM LABS PTE. LTD. : Case No. 24-10070 (BLS)
Debtor.¹ : Re: Docket No. __
: -----x

**ORDER EXTENDING TIME TO FILE (I) SCHEDULES
OF ASSETS AND LIABILITIES AND STATEMENT OF
FINANCIAL AFFAIRS AND (II) 2015.3 FINANCIAL REPORT**

Upon the motion (the “**Motion**”)² of Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), for entry of an order (i) extending the deadline to file its schedules of assets and liabilities and statement of financial affairs (the “**Schedules and Statement**”) through and including March 21, 2024, without prejudice to the Debtor’s right to request additional extensions, and (ii) extending the deadline to file its initial report of financial information with respect to entities in which the Debtor holds a controlling or substantial interest as set forth in Bankruptcy Rule 2015.3 (the “**2015.3 Report**”) through and including March 21, 2024, without prejudice to the Debtor’s right to request additional extensions, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and § 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and this Court having held a hearing to consider the relief requested in the Motion (the “**Hearing**”), if necessary; and upon the First Day Declaration and the record of the Hearing, if any; and all objections to the relief requested in the Motion, if any, having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Debtor is granted an extension of the deadlines to file its Schedules and Statement and its initial 2015.3 Report through and including March 21, 2024, without prejudice to the Debtor’s right to seek further extensions of such deadlines.
3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
4. The Debtor is authorized to take all actions necessary or appropriate to effectuate the relief granted in this Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.